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6 Attorney for Defendant
7 MARTIN CERVANTES VASQUEZ

8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10
11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 MARTIN CERVANTES VASQUEZ,
15 Defendant

CASE NO. 2:20-CR-00193 DJC

**STIPULATION TO CONTINUE
SENTENCING HEARING; ORDER**

16
17 Defendant MARTIN CERVANTES VASQUEZ, by and through his counsel of record, TONI
18 WHITE, and the GOVERNMENT, by and through Assistant United States Attorney DAVID
19 SPENCER hereby stipulate as follows:

- 20 1. By previous order, this matter was set for sentencing on January 23, 2025.
21 2. By this stipulation, defendant now moves to continue the sentencing to February 27,
22 2025. The GOVERNMENT does not oppose this request.
23 3. The defense has been in the process of obtaining mitigating information to present to the
24 probation officer and is awaiting medical records. This continuance will allow for the process to be
25 completed and will provide time for completion of the presentence report and additional defense
26 preparation including the drafting and submission of sentencing briefing.
27 4. The probation officer, Sarah Brown, is available and is in agreement with the disclosure
28 schedule requested by the parties.

1 5. The parties request the following disclosure schedule:

2 Judgment and Sentencing Date: February 27, 2025

3 Reply, or Statement of Non-opposition: February 20, 2025

4 Motion for Correction of the Presentence Report shall be filed
5 with the Court and served on the Probation Officer and opposing
counsel no later than: February 13, 2025

6 The Pre-Sentence Report Shall be Filed with the Court and
7 Disclosed to Counsel no Later Than: February 6, 2025

8 Counsel's Written Objections to the Pre-Sentence
9 Report Shall be Delivered to the Probation Officer
and Opposing Counsel no Later Than: January 30, 2025

10 The Proposed Pre-Sentence Report Shall be Disclosed
to Counsel no Later than: January 16, 2025

1 IT IS SO STIPULATED.

2 Dated: December 5, 2025

3 PHILLIP A. TALBERT
United States Attorney

4 By: /s/ Toni White for
5 DAVID SPENCER
Assistant U.S. Attorney

6 For the United States

7
8 Dated: December 5, 2025

By: /s/ Toni White
9 TONI WHITE

10 For Defendant Martin Cervantes Vasquez

11
12
13 **ORDER**

14 IT IS SO FOUND AND ORDERED this 16th day of December, 2024.

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16 Dated: December 16, 2024

/s/ Daniel J. Calabretta
17 THE HONORABLE DANIEL J. CALABRETTA
18 UNITED STATES DISTRICT JUDGE
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